

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GUCCI AMERICA, INC.,

Plaintiff,

-against-

GUESS?, INC., MARC FISHER FOOTWEAR
LLC, THE MAX LEATHER GROUP/CIPRIANI
ACCESSORIES, INC., SEQUEL AG, K&M
ASSOCIATES L.P., VIVA OPTIQUE, INC.,
SIGNAL PRODUCTS, INC. and SWANK, INC.,

Defendants.

Civil Action No. 09cv4373
(SAS)(JLC)

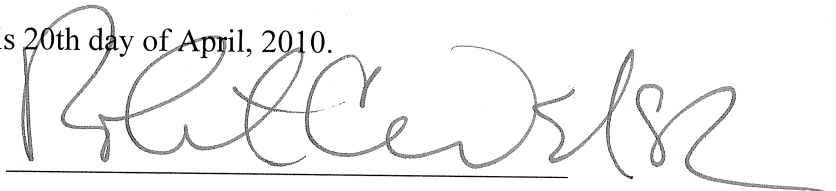
**SUPPLEMENTAL DECLARATION OF
ROBERT C. WELSH IN SUPPORT OF
GUESS?, INC.'S OPPOSITION TO
PLAINTIFF GUCCI AMERICA, INC.'S
MOTION FOR A PROTECTIVE ORDER
AGAINST THE DISCLOSURE OF THE
PRIVILEGED COMMUNICATIONS OF
PLAINTIFF'S IN-HOUSE LEGAL
COUNSEL JONATHAN MOSS**

ROBERT C. WELSH hereby declares as follows under penalty of perjury:

1. I am a partner in the law firm of O'Melveny & Myers, LLP, counsel to defendant Guess, Inc? in this action. I submit this supplemental declaration in opposition to plaintiff Gucci America, Inc.'s motion for a protective order against the disclosure of communications with plaintiff's in-house counsel Jonathan Moss. All of the facts set forth herein are known to me personally, and if called as a witness, I could and would testify competently thereto.

2. Attached hereto as Exhibit A are copies of the front side of membership cards from the State Bar of California for the years 2002 and 2010. A call to the State Bar of California will confirm that the cards issued to bar members on inactive status also contain the language "Only active members are entitled to practice law."

Declared under penalty of perjury this 20th day of April, 2010.



ROBERT C. WELSH

EXHIBIT A

THE STATE BAR OF CALIFORNIA

2002

This certifies that the person whose name appears on this card has paid the annual fee required by statute.

Only active members are entitled to practice law.



Executive Director / Secretary

Status:

ACTIVE

Bar No:

[REDACTED]



THE STATE BAR OF CALIFORNIA

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IN ORDER TO ASSURE A FREE AND JUST SOCIETY UNDER LAW.
Only active members are entitled to practice law.

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Jeddy Johnson
Executive Director / Secretary